



STATE OF LOUISIANA  
DEPARTMENT OF STATE CIVIL SERVICE  
**LOUISIANA BOARD OF ETHICS**

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Monday, September 27, 2021

Ronnie Johns  
Chairman  
Louisiana Gaming Control Board  
1032 Laura Circle  
Sulphur, Louisiana 70663

**Re: Louisiana Board of Ethics  
Docket No. 2021-716**

Dear Chairman Johns:

The Louisiana Board of Ethics ("Board"), at its October 8, 2021 meeting, considered your request for an advisory opinion as to whether the Louisiana Code of Governmental Ethics ("Code") would prohibit your continued service as Chairman of the Louisiana Gaming Control Board while you serve on the Board of Directors of Lakeside Bank in Lake Charles, Louisiana.

**FACTS PROVIDED**

You serve on the Board of Directors of Lakeside Bank, which is a local community bank located in Lake Charles, Louisiana. Recently, you were appointed the Chairman of the Louisiana Gaming Control Board ("LGCB"). Lakeside Bank does not have any business, contracts, or other financial relationship with the LGCB. Additionally, no facet of Lakeside Bank's business is regulated by the LGCB. Mr. Johns is not an employee of Lakeside Bank and is not involved in the day to day operations of the Bank. You have requested an advisory opinion concerning whether your continued service on both boards constitute a violation of the Code.

**LAW**

**La. R.S. 42:1111(C)(2)(d)** provides that no public servant and no legal entity in which the public servant exercises control or owns an interest in excess of twenty-five percent, shall receive any thing of economic value for or in consideration of services rendered, or to be rendered, to or for any person during his public service unless such services are: (d) Neither performed for nor compensated by any person or from any officer, director, agent, or employee of such person, if such public servant knows or reasonably should know that such person has or is seeking to obtain contractual or other business or financial relationships with the public servant's agency; conducts operations or activities which are regulated by the public employee's agency; or has substantial economic interests which may be substantially affected by the performance or nonperformance of the public employee's official duty.

## **CONCLUSION**

The Board concluded, and instructed me to inform you, that based on the facts presented, the Code does prohibit you from continuing to serve on the Lakeside Board of Directors while you serve as the Chairman of the LGCB. La. R.S. 42:1111(C)(2)(d) prohibits a public servant and legal entity's in which the public servant owns more than twenty-five percent shall receive any thing of economic value for service rendered or to be rendered for any person from whom the public servant would be prohibited from receiving gifts in accordance with La. R.S. 42:1115(A)(1) or (B). Lakeside Bank does not have a contractual, business, or other financial relationship with your agency – the LGCB.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Louisiana Code of Governmental Ethics. The Board issues no opinion as to past conduct or as to laws other than the Louisiana Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Act, and the conflict of interest provisions contained in the Louisiana Gaming Control Law. If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

**LOUISIANA BOARD OF ETHICS**

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LaToya D. Jordan  
For the Board

**DISCLAIMER**  
This is a draft opinion and it is NOT an opinion of the Louisiana Board of Ethics. The analysis and conclusions herein are provided for discussion purposes only, and are subject to change or revision at the meeting of the Board of Ethics at which this matter is considered.